

REMARKS/ARGUMENTS

Claims 1-21 are pending in this application. Claims 1, 10, 13-14, and 16-21 have been currently amended. Claims 1, 10, 16 and 21 are independent claims. Support for the amendment may be found throughout the specification and drawings.

Claim Rejections – 35 USC § 102

Claims 1-8, 10-14, 16-18 and 20-21 were rejected under 35 U.S.C. § 102(e) as being anticipated by Sjolander et al. ("Sjolander", U.S. Patent Number 6,587,959). Applicant respectfully traverses this rejection. However, independent Claims 1, 10, 16 and 21 have been currently amended.

Anticipation requires the disclosure in a single prior art reference of each element of the claim under consideration. *W.L. Gore & Assocs. v. Garlock*, 721 F.2d 1540, 220 USPQ 303 (Fed. Cir. 1983), cert. denied, 469 U.S. 851 (1984). Further, "anticipation requires the presence in a single prior art reference disclosure of each and every element of the claimed invention, arranged as in the claim." *Lindemann Maschinenfabrik GmbH v. American Hoist & Derrick Co.*, 730 F.2d 1452, 221 USPQ 481, 485 (Fed. Cir. 1984) (citing *Connell v. Sears, Roebuck & Co.*, 722 F.2d 1542, 220 USPQ 193 (Fed. Cir. 1983)) (emphasis added).

Independent Claims 1, 10, 16 and 21, as amended, each recite an element of an apparatus or an input/output interface including "a single controller" (emphasis added). In rejecting the original Claims 1 and 10, the Patent Office has analogized a server cluster of Sjolander to an input/output interface (Office Action, page 2, line 3 from bottom). Applicant respectfully disagrees.

Sjolander relates "particularly to addressing schemes for sending messages to peripherals connected to clustered computers" (emphasis added) (col. 1, lines 8-9) and teaches that "the server cluster is composed of at least two servers, managed as a single system where all servers share peripheral devices" (emphasis added) (col. 3, lines 35-37; FIG. 3). Thus, if a single server (or the processor in the single server) in the server cluster is analogized to a controller as claimed in Claims 1, 10, 16 and 21, the server cluster of Sjolander has at least two "controllers."

Therefore, Sjolander fails to teach, disclose, or suggest the element of an apparatus or an input/output interface including "a single controller," as claimed in Claims 1, 10, 16 and 21. Therefore, the rejections should be withdrawn, and Claims

1, 10, 16 and 21 should be allowed.

Claims 2-9 depend from Claim 1 and are therefore allowable due to their dependence upon Claim 1. Claims 11-15 depend from Claim 10 and are therefore allowable due to their dependence upon Claim 10. Claims 17-20 depend from Claim 16 and are therefore allowable due to their dependence upon Claim 16.

Claim Rejections – 35 USC § 103(a)

Claims 9, 15 and 19 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Sjolander in view of Bass et al. (“Bass”, U.S. Patent Number 6,137,797). Applicant respectfully traverses this rejection.

“To establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations.” (emphasis added) (MPEP § 2143). If an independent claim is nonobvious under 35 U.S.C. 103, then any claim depending therefrom is nonobvious. (emphasis added) *In re Fine*, 837 F.2d 1071, 5 USPQ2d 1596 (Fed. Cir. 1988).

As indicated in the foregoing *Claim Rejections – 35 USC § 102* section, Sjolander fails to teach, disclose, or suggest the element of an apparatus or an input/output interface including “a single controller,” as claimed in Claims 1, 10 and 16. Furthermore, Bass also fails to teach, disclose, or suggest the above-indicated claim element. Thus, independent Claims 1, 10 and 16 are nonobvious under 35 U.S.C. § 103.

Claims 9, 15 and 19 depend from Claims 1, 10 and 16, respectively, and are therefore nonobvious due to their dependence. Thus, the rejection should be withdrawn, and Claims 9, 15 and 19 should be allowed.

CONCLUSION

In light of the foregoing, Applicant respectfully requests that a timely Notice of Allowance be issued in the case.

Respectfully submitted on behalf of
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Dated: January 5, 2004

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